

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Plaintiff,

v.

Litchain Corp. and Gaffney Board of Public
Works,

Defendants.

C/A No.: 7:23-cv-01427-TMC

Gaffney Board of Public Works,

Counter-/Cross-Claimant,

v.

Blockquarry Corp. f/k/a ISW Holdings, Inc.,
Counterclaim Defendant, and Litchain Corp.,

Crossclaim-Defendant.

DECLARATION OF *BEAU BARTCH*

Pursuant to 28 U.S.C. § 1746, Beau Bartch declares as follows:

1. I am over the age of eighteen years and competent to testify in the instant case.
2. I am employed by Poseidon Security Group, LLC ("Poseidon") and report to Lawrence Davis in that capacity. I am an Army veteran with an honorable discharge.
3. Poseidon was retained by Plaintiff Blockquarry Corp. f/k/a ISW Holdings, Inc. ("Blockquarry") to, among other things, remove and inventory Bitcoin mining equipment from real property located at 150 Hyatt Street, Gaffney, South Carolina (the "Premises"). I am informed that the Premises is the same real property at issue in this litigation and is owned by Defendant Gaffney Board of Public Works (the "Utility").

4. On October 11, 2023, I appeared on the Premises to assess the condition of Blockquarry's personal property that was maintained on the Premises, including (20) forty-foot shipping containers, numbered one through twenty ("container" or, collectively, containers"), with Bitcoin mining servers installed within them. I was informed Blockquarry did not have access to the Premises since the Utility padlocked the gate sometime during February 2023.

5. On October 11, Utility representatives did not allow me access to the interior of the Premises, but I was permitted without objection to examine the perimeter of the fence line. On this occasion, I observed cloth laid over razor wire on top of the fence. The cloth was placed in an area of the fence line that is least visible from Hyatt Street—the road servicing ingress and egress to the Premises. I also observed a Ford 150 truck on the Premises, inside the fence line. On information and belief, the truck is owned by Blockquarry's contracted management company that was present on the Premises during Blockquarry's Bitcoin mining operation.

6. On October 19, 2023, I was permitted on the Premises by the Utility and performed a count of all Bitcoin mining servers (commonly and hereinafter, "miners") installed in the containers. On this day, I observed that the truck was no longer on the Premises. I also performed another perimeter search of the fence line enclosing the Premises. On this occasion, I observed a large hole under the fence line that a person could easily use to gain access to the Premises. To determine if this was the case, I stacked rocks in the hole, making an unnatural obstacle that a person wishing to access the Premises would have to move to pass through the space.

7. Finally, while preparing to leave for the day on October 19, I placed a marker on each container in such a manner that, upon another visual inspection, it could alert me that someone accessed the inside of the container.

8. On November 7, I was permitted on the Premises by the Utility and inside the fence line. On this occasion, I observed the rocks I stacked in the fence hole were moved, allowing enough space under the fence for an individual to access the Premises. I also observed that containers numbered 2, 5, 6, 8, 10, 12, and 17 no longer had the markers I placed on them. The remaining containers still had their markers.

9. I performed an additional miner count while on the Premises on November 7. The count on this day showed—when compared against the count from October 19—that: (1) miner was missing from *container number 2*; (10) miners were missing from *container number 5*; (1) additional miner was present in *container number 6*; and (10) additional miners were present in *container number 10*.

10. These facts show someone was present on the Premises and *inside* containers numbered 2, 5, 6, and 10 without authorization, and strongly suggest someone was inside containers numbered 8, 12, and 17 without authorization.

[signature page follows]

FURTHER AFFIANT SAYETH NOT.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

AFFIRMATION

Sworn before me on the 12th day of
January 2024.

Grace Adelai Emery

Notary Public for Missouri

My Commission expires: Aug. 30, 2026

[seal]

BEAU BARTCH

[Signature]

Beau Bartch, in his capacity as employee of
Poseidon Security Group, LLC

Executed on January 11, 2024.

